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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**REORGANIZED DEBTORS' REPORT
ON RESPONSES TO SEVENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (NO BASIS FOR CLAIM –
FAILURE TO PROVIDE ANY
TRADING INFORMATION) AND
REQUEST FOR ORDER BY DEFAULT
AS TO UNOPPOSED OBJECTIONS**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

[Re: Dkt. No. 10788]

**Resolving Objections Set for Hearing
July 28, 2021 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Seventh Securities Claims Omnibus*
9 *Objection (No Basis for Claim – Failure to Provide Any Trading Information)* [Docket No. 10788] (the
10 “**Seventh Securities Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE SEVENTH SECURITIES CLAIMS OMNIBUS OBJECTION**

12 The Seventh Securities Claims Omnibus Objection seeks to disallow and expunge the proofs of
13 claim that were filed by PG&E security holders who have failed to provide any trade-level securities
14 data and thus these proofs of claim lack any basis to assert liability against the Reorganized Debtors.
15 These claims are listed in Exhibit 1 to the Seventh Securities Claims Omnibus Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Seventh*
18 *Securities Claims Omnibus Objection (No Basis for Claim – Failure to Provide Any Trading*
19 *Information)* [Docket No. 10790] (the “**Notice of Hearing**”). The Seventh Securities Claims Omnibus
20 Objection was also supported by the *Declaration of Edward J. Radetich, Jr. in Support of Reorganized*
21 *Debtors’ Seventh Securities Claims Omnibus Objection (No Basis for Claim – Failure to Provide Any*
22 *Trading Information)* [Docket No. 10789] (the “**Declaration**”). The Seventh Securities Claims Omnibus
23 Objection, the Notice of Hearing, and the Declaration were served as described in the *Certificate of*
24 *Service* of Liliya Kulyk, filed on June 21, 2021 [Docket No. 10835] (the “**Certificate of Service**”). As
25 further described in the Certificate of Service, on June 16, 2021, each holder of a claim listed on Exhibit 1
26 to the Seventh Securities Claims Omnibus Objection received a notice including the claim number,
27 debtor, claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the
28 applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Seventh Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following informal response:

Docket No.	Claimant	Claim No.	Resolution
Informal	Janus Capital Management LLC	98185	The Reorganized Debtors are working to consensually resolve this objection and have removed this claim from Exhibit A to this Request. This matter has been continued to the August 10, 2021, Omnibus Hearing.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner with the law firm of Weil, Gotshal & Manges LLP (“Weil”), counsel for the Reorganized Debtors.

2. The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Seventh Securities Claims Omnibus Objection except as described herein.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed “Claims to be Disallowed/Expunged” in **Exhibit A** to this Request, which listed claims identical to those in Exhibit 1 to the Seventh Securities Claims Omnibus Objection, except as otherwise discussed above.

Dated July 21, 2021

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors